

# EXHIBIT A

**Moshe Boroosan**

---

**From:** Moshe Boroosan  
**Sent:** Wednesday, April 20, 2022 9:24 AM  
**To:** Jeremy Doberman  
**Cc:** Isaac Diskind; Abraham Kleinman v. Chaim Porges  
**Subject:** Re: [Kleinman v. Roc Capital Holdings LLC, 22-03566]

Mr. Doberman:

Chag sameach. I am somewhat perplexed by your statement that this case hast just come to your attention. During the April 11, 2022 hearing on Mr. Porges' order to show cause, you represented to the court that you were aware of those case and were familiar with its allegations, including the jurisdictional allegations.

I am even more perplexed by the fact that you waited an additional nine days, until the day before your answer was due, to seek an extension, especially since you knew ypu would be traveling abroad. It was also inappropriate to leave your files when you knew about the impending deadline.

Nevertheless, I am authorized to give you until April 27, 2022 to respond to the complaint. To the extent you intend to seek additional time, Plaintiff opposes that request.

This is becoming a pattern with your client. We will grant you a courtesy this one time but will not tolerate this gamesmanship moving forward. I expect you to either comply with existing deadlines or confer with us sufficiently in advance so we can consider and respond to any adjournment request.

Sincerely,  
Moshe

Sent from my Verizon, Samsung Galaxy smartphone

---

**From:** Jeremy Doberman <jeremyd@marcwlaw.com>  
**Sent:** Wednesday, April 20, 2022 3:49:07 AM  
**To:** Moshe Boroosan <moshe@boroosanlaw.com>  
**Cc:** Isaac Diskind <isaacd@marcwlaw.com>  
**Subject:** [Kleinman v. Roc Capital Holdings LLC, 22-03566]

Mr. Boroosan,

It has come to my attention that you have commenced a case in the SDNY bearing the above-caption and case number. I am presently traveling abroad without access my files in New York. Would you kindly consent to a 30-day extension of time to answer as a courtesy?

Sincerely,

Jeremy Doberman

Marc Wohlgemuth & Associates P.C.  
21 Remsen Avenue  
Suite 301  
Monsey, New York 10952  
845-746-2700 x 8005  
845-746-2701

**ALERT: All wire instructions sent or received by this office MUST be verbally confirmed prior to initiating any wire transfer. Marc Wohlgemuth & Associates, P.C. will NOT issue a wire until wiring instructions are verbally confirmed and will not assume responsibility for wires issued to the firm without prior verbal confirmation.**

CIRCULAR 230 NOTICE: To ensure compliance with requirements imposed by U.S. Treasury Regulations, Marc Wohlgemuth & Associates P.C. informs you that any U.S. tax advice contained in this communication (including any attachments) was not intended or written to be used, and cannot be used, for the purpose of (i) avoiding penalties under the Internal Revenue Code or (ii) promoting, marketing or recommending to another party any transaction or matter addressed herein.

CONFIDENTIALITY NOTICE: This electronic mail transmission is confidential, may be privileged and should be read or retained only by the intended recipient. If you have received this transmission in error, please immediately notify the sender and delete it from your system.